

**IN THE UNITED STATES DISTRICT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

HICHAM IMANI,	:	
	:	
Plaintiff,	:	Civil Action No. 07-07966-LTS
	:	
v.	:	District Judge Honorable
	:	Laura Taylor Swain
U-HAUL INTERNATIONAL, INC., U-HAUL CO.	:	
OF PENNSYLVANIA and U-HAUL CO. OF	:	
NEW YORK AND VERMONT, INC.,	:	
	:	
Defendants.	:	
	:	

MEMORANDUM OF LAW IN SUPPORT OF JOINT MOTION TO FILE UNDER SEAL

Defendants U-Haul Co. of New York and Vermont, Inc., U-Haul Co. of Pennsylvania and U-Haul International, Inc. (“Defendants”) and Plaintiff Hicham Imani (“Imani” or “Plaintiff”), by and through their attorneys, submit this Motion and respectfully request that the Court allow the parties to file Confidential documents under seal pursuant to Rule 6 of the United States District Court, Southern District of New York, Procedures for Electronic Case Filing.¹ Defendants do not waive any of the arguments with respect to whether U-Haul Co. of Pennsylvania and U-Haul International, Inc. are proper parties and/or subject to the jurisdiction of this Court by filing this Joint Motion.

On October 22, 2007, the parties entered into a Stipulation of Confidentiality regarding the production of documents and information that are confidential, proprietary, or of a personal nature to the parties or to the current or former employees of Defendants (hereinafter referred to

¹ Defendants deny that Defendants U-Haul International, Inc. and U-Haul Co. of Pennsylvania are proper parties to this action. Defendants further deny that this Court has personal jurisdiction over these two defendants. By submitting this Joint Motion, Defendants do not thereby waive their right to object to the Court’s personal jurisdiction over Defendants U-Haul International, Inc. and/or U-Haul Co. of Pennsylvania, or to raise the issue of whether Defendants U-Haul International, Inc. and/or U-Haul Co. of Pennsylvania are proper parties to this action.

collectively as “Confidential Materials”). A true and correct copy of the executed Stipulation of Confidentiality is attached hereto as **Exhibit A**. The Stipulation of Confidentiality provides that “[a]ny documents filed with the Court containing Confidential Material shall be designated as such and filed under seal.” (See Exhibit A, ¶ 6).

The parties hereby request permission to file documents containing Confidential Material under seal, in accordance with the applicable Court rules, including Rule 6 of the United States District Court, Southern District of New York, Procedures for Electronic Case Filing. Although the parties are still engaged in written discovery, and have not yet identified which Confidential documents may be exhibits to any forthcoming motions, they submit this Joint Motion to promote judicial efficiency and to avoid any delays in complying with the applicable rules.

For all the foregoing reasons, the Joint Motion should be granted, and the parties should be permitted to file documents under seal, as set forth in the attached Joint Stipulation, and in accordance with the applicable rules of this Court.

Respectfully submitted,

s/Theresa J. Chung

Michael S. Burkhardt (MB-7252)

Theresa J. Chung (TC3200)

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Pennsylvania, and U-Haul Co. of New York
and Vermont, Inc.

Date: November 19, 2007